

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**IN THE MATTER OF A CRIMINAL
COMPLAINT**

Case No. 1:22-mj-01337 -JMC

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Lisa A. Christy of The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being duly sworn, depose and state as follows:

INTRODUCTION

1. This Affidavit is submitted in support of a Criminal Complaint charging Kevin MATTHEWS with possession of a firearm by a convicted felon, in violation of 18 U.S.C. § 922.

2. I am an “investigative or law enforcement officer . . . of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. I am a Special Agent (“SA”) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) and I am currently assigned to a joint task force comprised of ATF agents and detectives from the Baltimore Police Department (“BPD”). I have been employed by the ATF since September 9, 2008, and have been an ATF agent in Baltimore since April 2009. I have participated in numerous investigations focusing on the trafficking of controlled dangerous substances (CDS), illegal firearms use and gang activity. I have conducted covert surveillance of suspected CDS traffickers, interviewed numerous individuals involved in gangs and the CDS trafficking, participated in several Title III wiretap investigations as a monitor and a member of the surveillance team, participated in the execution of numerous state and federal search and arrest warrants involving

CDS traffickers and violent offenders, and participated in the seizure of numerous firearms and controlled dangerous substances.

3. The statements made in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided to me by other law enforcement officers and (d) the training and experience of myself and other law enforcement agents and officers.

4. This Affidavit is made for the limited purpose of establishing probable cause in support of a Criminal Complaint and contains only a summary of relevant facts. I have not included every fact known to me concerning the entities, individuals, and the events described in this Affidavit, but I do not believe I have omitted any information that would have a tendency to defeat a showing of probable cause.

PROBABLE CAUSE

5. On Sunday, October 17, 2021, at approximately 11:22 pm, officers from the Baltimore Police Department (BPD) went to a residence in the 3000 block of Spelman Road, in Baltimore City, Maryland in response to a report of an aggravated assault. Upon arrival, the officers spoke to an individual who reported that Kevin MATTHEWS was inside the residence, intoxicated and had displayed a firearm.

6. As the officers approached the residence, they saw an individual, later identified as MATTHEWS exiting the building. The individual who had called the police identified the individual as MATTHEWS. The officers approached MATTHEWS, placed him in custody and searched his person. The officers recovered a black Glock handgun .17 9X19 that was loaded with (22) 9mm live rounds from MATTHEWS's waistband area and suspected controlled substances from his jacket pocket.

7. The Glock pistol was examined and found to be an operable firearm. Moreover, the firearm was manufactured outside the state of Maryland and, therefore, moved in or effected interstate commerce between the time it was manufactured and the time it was recovered by the Baltimore Police. Based on a review of MATTHEWS's criminal record, it appears that MATTHEWS was previously convicted of a crime punishable by more than one year imprisonment and served more than a year imprisonment. Accordingly, I believe MATTHEWS was aware that he had previously been convicted of a crime punishable by more than one year imprisonment.

CONCLUSION

8. Based on the foregoing, I submit that there is probable cause to believe that on October 17, 2021, Kevin MATTHEWS possessed a firearm after a prior felony conviction in violation of 18 U.S.C. § 922.

WHEREFORE, in consideration of the facts presented, I respectfully request that this Court issue an arrest warrant for Kevin MATTHEWS.

LISA CHRISTY Digitally signed by LISA CHRISTY
Date: 2022.04.29 09:36:56 -04'00'

Lisa A Christy
Special Agent, ATF

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41 this 29th day of April, 2022.




Honorable J. Mark Coulson
United States Magistrate Judge